

# EXHIBIT 1

**ALYSSA TRUNZO,**  
285 Mennonite Camp Road  
Mt. Pleasant, PA 15666

**V.**

Defendants.

Docket #: GD-22-013097

## JURY TRIAL DEMANDED

Filed on behalf of: Plaintiffs.

David M. Kobylinski, Esquire  
Pa. ID No.: 92233

Peter T. Kobylinski, Esquire  
Pa. ID No.: 309832

**PRAETORIAN LAW GROUP, LLC**  
515 Court Place, Ste 4  
Pittsburgh, PA 15219  
(412) 281-6600

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 神戶  
 馬尼拉  
 宿務  
 新加坡  
 仰光  
 加爾各答  
 孟買  
 巴達維亞  
 泗水  
 三寶壟  
 巨港  
 望加錫  
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DEPT. OF COURT RECORDS  
CIVIL/FAMILY DIVISION  
ALLEGHENY COUNTY PA

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

<b>ALYSSA TRUNZO,</b>	)	
	)	CIVIL DIVISION
Plaintiff,	)	
	)	
v.	)	Docket #: GD-22-_____
	)	
<b>KINDERCARE EDUCATION, INC.,</b>	)	
	)	<b>JURY TRIAL DEMANDED</b>
Defendant.	)	
	)	

**NOTICE TO DEFEND**

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you. YOU SHOULD TAKE THIS PAPER TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Lawyer Referral Service  
Allegheny County Bar Association  
11<sup>th</sup> Floor Koppers Building  
436 Seventh Avenue  
Pittsburgh, PA 15219  
(412) 261-5555

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

<b>ALYSSA TRUNZO,</b>	)	
	)	CIVIL DIVISION
Plaintiffs,	)	
	)	
v.	)	Docket #: GD-22-_____
<b>KINDERCARE EDUCATION, INC.,</b>	)	
	)	
Defendants.	)	<b>JURY TRIAL DEMANDED</b>
	)	
	)	

**COMPLAINT**

Alyssa Trunzo, through counsel, avers as follows:

**I. Parties and Venue**

1. Alyssa Trunzo is an adult individual who resides at 285 Mennonite Camp Road, Mt. Pleasant, PA 15666.

2. KinderCare Education, Inc is foreign corporation headquartered at 650 NE Holladay St #1400, Portland OR 97232.

3. Venue is appropriate in Allegheny County because defendant conducts business herein on a regular and continuing basis.

**II. Concise Statement of Facts**

4. Prior to March 31, 2022, plaintiff was employee of defendant at its North Huntington location.

5. Plaintiff worked as an assistant preschool teacher. She provided to care to children under the age of six.

6. On or around March 31, 2022, plaintiff met with defendant's agent or employee, Amber Humbert. Plaintiff walked into the meeting believing this was routine meeting in which her proposed lesson plan was to be discussed.

7. Instead, Ms. Humber accused plaintiff of abusing a child by pulling the child's arm and placing the child into a corner. Ms. Humber advised these events occurred on or around March 25, 2022.

8. Plaintiff denied that she had ever pulled a child's arm or placed the child into a corner. Plaintiff explained to Ms. Humber that the child in question had tipped over a toy vehicle and she had helped the child extricate himself. She explained further that after she helped the child out of the toy, the child ran off to play with other children and was not placed into a corner.

9. Moreover, plaintiff explained that she would never do the things Ms. Humber accused her of.

10. Ms. Humber nonetheless stated to plaintiff that her employment with defendant was going to be terminated.

11. When informed she was being terminated, plaintiff responded that she had already received a better employment offer from the Seton Hill Child Development Center and had intended to put in her notice anyways.

12. Plaintiff was informed that defendant had contacted Seton Hill Child Development Center and informed them that plaintiff had physically abused children while under their employ.

13. These statements were false. Moreover, defendant knew or should have known the statements were false. As such, plaintiff believes and therefore avers they were made with malicious intent.

14. To plaintiff's knowledge, defendant made no report of this alleged incident to any governmental authority even though such event would have been a mandatory reporting incident.

15. Moreover, defendant knew or should have known that plaintiff denied this event and that the report itself was unreliable.

16. On or around May 3, 2020, plaintiff's employment with Seton Hill Child Development Center was terminated.

17. In addition, plaintiff was studying for an Associate's degree in child care at the Westmoreland County Community College (the "WCCC").

18. Plaintiff is informed and therefore believes that Ms. Humber contacted the WCCC and falsely reported to them that plaintiff had engaged in abusing a child.

19. On March 30, 2022, the WCCC informed plaintiff she was being removed from the program as a result Ms. Humbert's false and malicious representations.

### **III. Damages**

20. As a direct and proximate cause of defendants conduct and actions, plaintiff has sustained the following damages:

- a) Plaintiff's reputation has been tarnished and damaged;
- b) Plaintiff has been subjected to ridicule by her colleagues, peers and persons vested with authority;
- c) Plaintiff has suffered and will continue to suffer from embarrassment, shame, humiliation and emotional distress;
- e) Plaintiff has lost and will continue to lose income; and
- f) Plaintiff has lost and will continue to lose business opportunities.

**COUNT I**

**Alyssa Trunzo v. KinderCare Education, Inc.**

**DEFAMATION**

21. Plaintiffs incorporates the foregoing paragraphs as if set forth at length.

22. The above-described defamatory statements of plaintiff resulted in her termination.

23. Defendant made the above-described statements while performing her duties for the Seton Hill Child Development Center.

24. Defendant's conduct in making the defamatory statements was outrageous and done with a willful disregard for the rights of others. As such, plaintiff makes a claim for punitive damages.

25. As a direct and proximate result of the harmful and false statements, plaintiff suffered the damages set forth above.

**WHEREFORE**, Plaintiffs prays for judgment in their favor and against that of defendants Kinder Care, Inc. and an award of damages in excess of \$50,000 exclusive of interests and costs.

**COUNT II**

**Alyssa Trunzo v. KinderCare Education, Inc.**

**TORTIOUS INTERFERENCE WITH CONTRACT**

26. Plaintiff incorporates the foregoing paragraphs as if set forth at length.

27. Defendant intentionally interfered with plaintiff's current employment relationship by contacting the Seton Hill Child Development Center and relaying the false information.

28. Defendant's conduct caused the plaintiff to be terminated from her current position and caused damage to her reputation.

29. Defendant further intentionally interfered with plaintiff's student relationship with the WCCC.

30. Defendant's conduct caused the plaintiff to be removed from her educational program and caused damage to her reputation.

31. Defendant's conduct in interfering with plaintiff's employment with the Seton Hill Child Development Center and the WCCC was outrageous and done with a willful disregard for the rights of others. As such, plaintiff makes a claim for punitive damages.

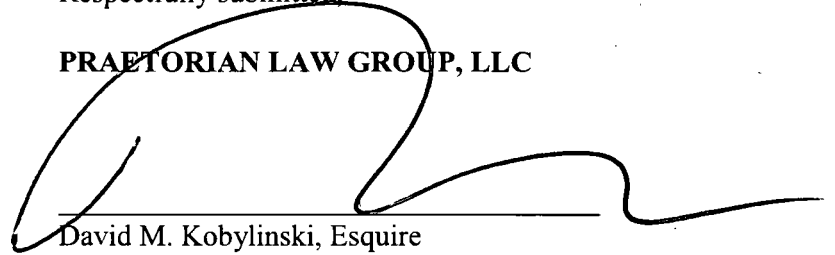
**WHEREFORE**, Plaintiff prays for judgment in her favor and against the defendant Kinder Care, and an award of damages in excess of \$50,000 exclusive of interests and costs.



**JURY TRIAL DEMANDED AS TO ALL COUNTS SOUNDING IN LAW**

Respectfully submitted,

**PRAETORIAN LAW GROUP, LLC**

A large, stylized handwritten signature in black ink, appearing to read 'David M. Kobylinski', is written over the firm name and extends to the right.

\_\_\_\_\_  
David M. Kobylinski, Esquire

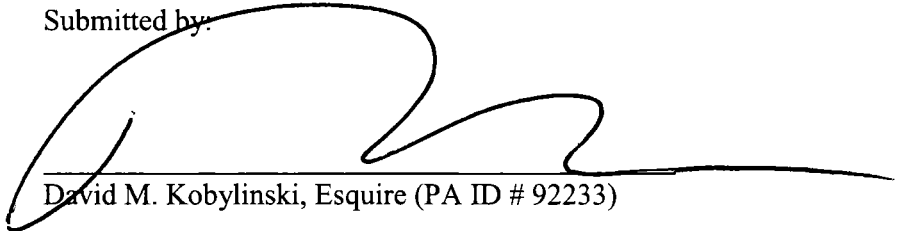
Dated: October 20, 2022

*Attorneys for Plaintiff*

**CERTIFICATE OF COMPLIANCE**

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by:

A handwritten signature in black ink, consisting of a large, stylized 'D' followed by a horizontal line and a small flourish.

David M. Kobylinski, Esquire (PA ID # 92233)

October 20, 2022

**VERIFICATION**

I, Alyssa Trunzo, hereby verify that I am the plaintiff in the foregoing action and that the facts set forth in the complaint are true and correct to the best of my knowledge, information and belief, and further state that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

*Alyssa Trunzo*

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Alyssa Trunzo

Dated: 10 / 13 / 2022



## Audit Trail

<b>TITLE</b>	Verify Complaint.pdf
<b>FILE NAME</b>	Verify%20Complaint.pdf
<b>DOCUMENT ID</b>	d0a19db8a841be19d1c5e386a3e12c009da7a0ce
<b>AUDIT TRAIL DATE FORMAT</b>	MM / DD / YYYY
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	<b>10 / 13 / 2022</b> 17:13:06 UTC	Sent for signature to Alyssa Trunzo (trunzoalyssa@gmail.com) from dave@koby.law IP: 67.165.109.95
	<b>10 / 13 / 2022</b> 20:51:38 UTC	Viewed by Alyssa Trunzo (trunzoalyssa@gmail.com) IP: 67.43.96.127
	<b>10 / 13 / 2022</b> 20:52:22 UTC	Signed by Alyssa Trunzo (trunzoalyssa@gmail.com) IP: 67.43.96.127
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## Supreme Court of Pennsylvania

Court of Common Pleas  
Civil Cover Sheet

ALLEGHENY

County

For Prothonotary Use Only:

Docket No:

TIME STAMP

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SECTION A

## Commencement of Action:

- ☒ Complaint ☐ Writ of Summons ☐ Petition  
☐ Transfer from Another Jurisdiction ☐ Declaration of Taking

Lead Plaintiff's Name:

ALYSSA TRUNZO

Lead Defendant's Name:

KINDRCARE EDUCATION, INC

Are money damages requested? ☒ Yes ☐ NoDollar Amount Requested: ☐ within arbitration limits  
(check one) ☒ outside arbitration limitsIs this a Class Action Suit? ☐ Yes ☒ NoIs this an MDJ Appeal? ☐ Yes ☒ No

Name of Plaintiff/Appellant's Attorney: DAVID M. KOBYLINSKI, ESQUIRE

☐ Check here if you have no attorney (are a Self-Represented [Pro Se] Litigant)

SECTION B

**Nature of the Case:** Place an "X" to the left of the ONE case category that most accurately describes your **PRIMARY CASE**. If you are making more than one type of claim, check the one that you consider most important.

**TORT** (do not include Mass Tort)

- ☐ Intentional  
☐ Malicious Prosecution  
☐ Motor Vehicle  
☐ Nuisance  
☐ Premises Liability  
☐ Product Liability (does not include mass tort)  
☒ Slander/Libel/ Defamation  
☐ Other: \_\_\_\_\_

**MASS TORT**

- ☐ Asbestos  
☐ Tobacco  
☐ Toxic Tort - DES  
☐ Toxic Tort - Implant  
☐ Toxic Waste  
☐ Other: \_\_\_\_\_

**PROFESSIONAL LIABILITY**

- ☐ Dental  
☐ Legal  
☐ Medical  
☐ Other Professional: \_\_\_\_\_

**CONTRACT** (do not include Judgments)

- ☐ Buyer Plaintiff  
☐ Debt Collection: Credit Card  
☐ Debt Collection: Other \_\_\_\_\_

- ☐ Employment Dispute: Discrimination  
☐ Employment Dispute: Other \_\_\_\_\_

☐ Other: \_\_\_\_\_**REAL PROPERTY**

- ☐ Ejectment  
☐ Eminent Domain/Condemnation  
☐ Ground Rent  
☐ Landlord/Tenant Dispute  
☐ Mortgage Foreclosure: Residential  
☐ Mortgage Foreclosure: Commercial  
☐ Partition  
☐ Quiet Title  
☐ Other: \_\_\_\_\_

**CIVIL APPEALS**

- Administrative Agencies  
☐ Board of Assessment  
☐ Board of Elections  
☐ Dept. of Transportation  
☐ Statutory Appeal: Other \_\_\_\_\_

☐ Zoning Board☐ Other: \_\_\_\_\_**MISCELLANEOUS**

- ☐ Common Law/Statutory Arbitration  
☐ Declaratory Judgment  
☐ Mandamus  
☐ Non-Domestic Relations Restraining Order  
☐ Quo Warranto  
☐ Replevin  
☐ Other: \_\_\_\_\_